



Flat Planet Phone Co.

ROBOCALL MITIGATION PLAN

Pursuant to 47 C.F.R. § 64.6305, The Flat Planet Phone Company Inc. submits this report on its implementation of the STIR/SHAKEN call authentication framework and its plan to prevent and mitigate illegal robocalls. This report describes the status of its implementation of STIR/SHAKEN and the practices and procedures The Flat Planet Phone Company Inc. (hereinafter also referred to as “Flat Planet” or “the Company”) has in place to mitigate illegal robocalls and may modify, add, delete or otherwise alter any of the policies and procedures described in the plan at any time to respond to changes in its business, its capabilities and its needs.

The role the company plays in the network is both a Voice Service Provider for domestic wholesale and business end user customers as well as an Non-Gateway Intermediate Provider. The Company provides Hosted PBX and International Call Center (Outbound only) Voice and FAX traffic over VOIP on its network. The Company has registered with the STI-PA. We have our own STIR/SHAKEN certificate that we use when authenticating calls we originate.

Flat Planet judiciously works to prevent unlawful robocalls from originating on its network. The Company does not have contracts, but enforces an acceptable use policy. Users are informed that the company will deny, suspend, or terminate service to a customer if they violate the policies. We have a vetting and review process for upstream providers, that is, providers that send us voice traffic that we terminate or transit to other providers.

Flat Planet confirms that the upstream providers have a certification in the Robocall Mitigation Database. We will not accept voice traffic from an unregistered provider. The Company has been informed of the upstream providers “Know-Your-Customer” guidelines and have provided them with the necessary KYC documentation they’ve requested that we complete.

Flat Planet follows the caller ID authentication best practices for vetting caller identity and operational legitimacy for new and existing customers as described by the NANC Call Authentication Trust Anchor Working Group.

This process includes the collection and review of entity-identifying information to confirm that the company has an authenticated relationship with the customer. The Company uses this authenticated information to determine whether the customer is subject to any enforcement actions that restrict the

type of calling that they may do, for example, if they have been banned from initiating telemarketing calls.

Flat Planet also validates, when possible, that the entity has a legitimate right to use its asserted calling numbers. The Company uses this information to support the attestation level it assigns to calls that it originates for that customer.

Flat Planet prohibits customers from initiating illegal robocalls. If the Company discovers a customer is initiating suspicious robocalls, it suspends their service immediately and then investigates the traffic. If it is determined that the traffic is illegal, the Company immediately terminates their service.

Flat Planet requires that upstream providers have a reasonable Robocall Mitigation Plan, including a vetting process for their customers as well as their upstream providers, and that they use call analytics to identify suspicious traffic.

Prior to installing services for new customers, the company takes the following measures to weed out end users that could potentially generate robocall traffic:

The Company only serves business customers and uses a KYCs to confirm the following information for its customers:

Customer's identity

Customer's right to use the telephone number presented on calls



Service Address

Credit History

Authentic and Legal Campaigns

Business Incorporation Documents

Flat Planet uses proprietary call analytics software provided to monitor all outbound voice traffic in real-time to prevent the origination or transit of illegal robocalls.

The software provides detailed reporting to identify suspected illegal robocalls. The Company will immediately suspend traffic and investigate any identified suspicious calls to determine if the caller or upstream provider was attempting to originate or transit unlawful robocalls. If the Company determines that the traffic was likely unlawful, then we terminate their services.

Flat Planet will comply fully with all conditions set forth in the FCC'S 2024 Report and Order mandating the implementation of the STIR/SHAKEN framework, as well as with the Commission's rules and policies

more generally.

Flat Planet has designated an individual as a dedicated point of contact for addressing traceback requests. It either has provided the ITG with the contact information and business hours for those individuals, or will do so upon receipt of the first request from the ITG. See <https://www.ustelecom.org/the-industry-traceback-group-itg/for-providers/>. The Company will respond promptly to inquiries from the Industry Traceback Group (ITG) within 24 hours (outside of religious holidays).

Flat Planet will provide valid law enforcement and regulatory agencies with the relevant non-proprietary information in response to reasonable and legitimate requests about illegal robocalls and suspicious activities, and implement mandated Robocall Mitigation procedures to the fullest extent possible with the goal of maximizing the mitigation of illegal robocalls. We respond within 24 hours to all traceback requests from the Commission, law enforcement, and the registered traceback consortium. We cooperate fully with such entities in investigating and stopping any illegal robocallers that use the Company's service to originate, carry, or process illegal robocalls. **Requests from the valid agency must be submitted in writing and include the following information:**

1. Law Enforcement Agency Name:
2. Agency Address:
3. Requestor's Name:
4. Requestor's Title:
5. Requestor's phone number:
6. Requestor's e-mail:

Flat Planet performs the same mitigation steps for all outbound calls regardless of our role in the call chain for a particular call. The Company has not had any agency action or investigation due to suspected unlawful robocalling or investigations.

Flat Planet is not subject to any Commission, Law Enforcement, or Regulatory Agency Action or investigation due to suspected unlawful robocalling or spoofing, but has never had a complaint or any legal action taken.



CONFIDENTIAL

Flat Planet does not wish to publicize any private and/or classified information that has the potential to expose the Company to fraud and/or anti-competitive actions. Therefore, the Company will submit a redacted version for the public site and requests that the FCC keep the unredacted version CONFIDENTIAL.